

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FOUNDATION AGAINST
INTOLERANCE AND RACISM, INC,

Plaintiff,

v.

STEVE WALKER, in his official capacity
as Executive Director of the Washington
State Housing Finance Commission,

Defendant.

No. 2:24-cv-01770-JHC

DECLARATION OF PAUL J.
LAWRENCE IN SUPPORT OF
DEFENDANT'S MOTION TO
DISMISS

I, Paul J. Lawrence, declare as follows:

1. I am a partner at Pacifica Law Group LLP and attorney of record in the above-captioned matter for Defendant Steve Walker. I am over the age of 18, competent to testify, and make this declaration based on personal knowledge of the facts stated herein.

2. Attached as **Exhibit A** is a true and correct copy of the Covenant Homeownership Program Study, which was released by the National Fair Housing Alliance in March 2024. The Study is publicly available on the Washington State Housing Finance Commission's ("Commission") website at:

<https://www.wshfc.org/covenant/WSHFCWACHPFULLSTUDY32024.pdf>.

DECLARATION OF PAUL J. LAWRENCE
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1 3. Attached as **Exhibit B** is a true and correct copy of a document created by the
2 Commission entitled “13 – Downpayment Programs,” which provides guidelines for the
3 Commission’s downpayment assistance programs. This document is publicly available on the
4 Commission’s website at: <https://www.wshfc.org/sf/13downpaymentprogramsHA1.pdf>.

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6 4. Attached as **Exhibit C** is a true and correct copy of a Commission webpage entitled
7 “Home Advantage Program FAQ,” which is available at: <https://www.wshfc.org/buyers/faq.htm>.

8 5. Attached as **Exhibit D** is true and correct copy of a Commission webpage entitled
9 “House Key Opportunity Program,” which is available at: <https://www.wshfc.org/buyers/key.htm>.

10 6. Attached as **Exhibit E** is a true and correct copy of a document created by the
11 Commission entitled “Covenant Homeownership Downpayment Assistance Program – Special
12 Purpose Credit Program,” which is publicly available on the Commission’s website at:
13 <https://www.wshfc.org/sf/CHOPManual2.pdf>.

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15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on this 20th day of December, 2024.

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18 s/ Paul J. Lawrence
19 Paul J. Lawrence, WSBA #13557

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DECLARATION OF PAUL J. LAWRENCE
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